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December 10, 2018

Ms. Victoria Rutson
Director, Office of Environmental Analysis
Surface Transportation Board
395 E. Street S.W.
Washington, D.C. 20423

Re: **Docket No. AB-55 (Sub-No. 786X), CSX Transportation, Inc.—Abandonment
Exemption—in Alachua County, FL**

Dear Ms. Rutson:

Enclosed please find the an email dated December 6, 2018, from the Alachua County Environmental Protection Department stating that the rail line is in the immediate vicinity of the Cabot/Koppers Federal Superfund Site and providing an Environmental Protection Agency contact.

Also enclosed is a letter dated December 7, 2018, from the City of Gainesville supporting the abandonment and stating that the Line is designated as a trail link on the City's adopted Parks Master Plan and the Transportation Mobility Element of the Comprehensive Plan.

CSXT is in negotiations to sell the Line to the customer adjacent to the Line and therefore, does not believe interim trail use/rail banking is suitable.

Sincerely yours,



Melanie B. Yasbin
Attorney for CSX Transportation, Inc.

Enclosures

Melanie Yasbin

From: Payne, Gene <Gene_Payne@csx.com>
Sent: Monday, December 10, 2018 7:44 AM
To: Melanie Yasbin
Subject: FW: RE: CSX Transportation notification: Abandonment Exemption - in Alachua County, FL
Attachments: CSX Transportation - Re STB Docket No. AB-55 - Sub No. 786X.PDF

Melanie, FYI -EPA Response

From: Gus Olmos <Gus@alachuacounty.us>
Sent: Thursday, December 6, 2018 11:33 AM
To: Payne, Gene <Gene_Payne@csx.com>
Subject: RE: CSX Transportation notification: Abandonment Exemption - in Alachua County, FL

Mr. Payne :

The proposed rail line is in the immediate vicinity of the Cabot / Koppers Federal Superfund Site. Please coordinate with:

Scott Miller
Remedial Project Manager
Environmental Protection Agency
Email : Miller.Scott@epa.gov
Phone: (404) 562-9120

Gus

Gus Olmos, P.E. / Hazardous Materials Manager
Alachua County Environmental Protection Department
gus@alachuacounty.us
Office: (352) 264-6806 / Cell: (352) 275-1344

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- EXTERNAL SENDER

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Gainesville.
Citizen centered
People empowered

**City of
Gainesville**

**Office of the City
Manager**
PO Box 490, Station 6
Gainesville, Florida
32627
352 334 5010

December 7, 2018

Mr. Gene Payne
CSX, Manager Joint Facilities
500 Water Street
Jacksonville, FL 32202

Re: STB Docket No. AB-55, CSX Transportation, Inc.-Abandonment Exemption-in Alachua County, FL

Dear Mr. Payne:

In response to your letter of November 14, 2018, addressed to Mayor Poe, the City of Gainesville has the following comments regarding the Combined Environmental and Historic Report (CEHR).

The land to be covered by the abandonment has a designation of Right of Way (ROW) defined by the City of Gainesville Land Development Code as:

Right-of-way means land dedicated, deeded, used or to be used for a street, alley, walkway, boulevard, drainage facility, access for ingress or egress, or other purposes by the public.

The City does not apply zoning or land use on right of way. If the ROW were to be abandoned, the property would be given the same land use designation and zoning as the adjacent property. The adjacent property has an Industrial Land Use Designation and I-2, *General Industrial* zoning to the west and I-1, *Limited Industrial* to the east.

The City does not support the statement in the CEHR in Section 3 (iv), Land Use:

CSXT believes the Line would not be suitable for interim trail use/rail banking.

The section of line proposed for abandonment is designated as a trail link in the City's adopted Parks Master Plan and the Transportation Mobility Element of the Comprehensive Plan. The City has long foreseen this section of ROW as being used for a trail.

The City of Gainesville supports the abandonment of the rail segment proposed by CSXT for the following reasons:

- It allows for the implementation of the extension of the Sixth Street multimodal trail which is envisioned to connect from its current termini at NW 16th Ave to NW 39th Ave. The project is outlined in the City's adopted Parks Master Planⁱ which affirms that multi-purpose trails are the preferred configuration for bicycle facilities wherever feasible, as they accommodate the largest amount of users in the safest fashion.
- Furthermore, the Transportation Mobility Element (TME) of the City's Comprehensive Planⁱⁱ has a specific goal that envisions the development of an interconnected trails network throughout the urban area expanding

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multimodal transportation options. Specifically TME Policies 5.1.5 and 5.1.6 encourage conversion and adaptive use of out-of-service rail corridor into facilities for bicycle and pedestrian use.

- The proposed segment for abandonment is immediately adjacent to the existing trail segment that runs for approximately 1.7 miles along an abandoned rail corridor and is a major component of the City's trail network. Both the City and the Florida Department of Transportation have invested significantly in this trail implementation over the years.
- Current efforts are underway to extend the trail north of NW 16th Ave to NE23rd Ave. The work includes an evaluation of soil contamination and the development of a mitigation plan.
- The Sixth Street Trail extension is identified as a priority project by the Metropolitan Transportation Planning Organizationⁱⁱⁱ and it is partially funded via a local sales tax initiative associated with the City's Parks Master Plan.

Should the abandonment proposal be allowed, the City of Gainesville would be interested in acquiring land rights to the segment that will allow the implementation of the extension of the multi-purpose trail.

Regarding Section (10) Proposed Mitigation, Paragraph 3 of the *Environmental Report* describes the proposed work. Included in the description is the action of 'possible removal of the upper layer of ballast'. The environmental issue emerging, if the proposed action is implemented, is that the lower layer of the ballasted area is a mixture of soil and ballast. Presently this surface is protected from direct rain hits by the ballast that trickles rain water onto the soil and ballast matrix at low velocity and dispersed over the entire area. Once the loose ballast is removed so is the intrinsic energy dissipation that protects the subgrade. Removal of the ballast allows rain to directly hit the subgrade and the soil portion of the matrix is more apt to be mobilized and conveyed by the runoff from the site during rain events. The ballast, if removed, exposes about 0.25 acre (1215 feet long by 10 feet wide) of subgrade. Stabilizing the exposed soil in the area seems to be an appropriate measure, if the ballast is removed.

Thank you for providing the City of Gainesville the opportunity to comment on the proposed abandonment of rail line within the city boundaries.

Sincerely,



Anthony Lyons
City Manager

Cc: Malisa McCreedy, Director of Mobility
Phil Mann, Director of Public Works
Wendy Thomas, Director of Doing

ⁱ Master Plan: PRCA Vision 2020, available online at <http://www.cityofgainesville.org/ParksRecreationCulturalAffairs/MasterPlan.aspx>

ⁱⁱ City's Transportation Mobility Element of Comprehensive Plan, available online at [http://www.cityofgainesville.org/Portals/0/plan/2017%20Backup/CPB/TRANSPORTATION%20MOBILITY Printable 170830.pdf](http://www.cityofgainesville.org/Portals/0/plan/2017%20Backup/CPB/TRANSPORTATION%20MOBILITY%20Printable%20170830.pdf)

ⁱⁱⁱ MTPO List of Priority Projects, available online at <http://www.ncfrpc.org/mtpo/publications/LOPP/LOPP18a.pdf>